

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STEPHAN MELISE,
 Plaintiff

v.

COYNE-FAGUE, et al.
 Defendants

:
:
:
:
:
:
:

C.A. No.: 1:17-cv-00490-MSM-PAS

**PLAINTIFF’S OBJECTION TO DEFENDANTS’ MOTION FOR PROTECTIVE
ORDER**

Plaintiff in the above-entitled matter does hereby object to Defendants Motion for Protective Order (ECF No. 66). As grounds therefor and in support thereof, Plaintiff incorporates by reference the arguments contained in Plaintiff’s Reply to Defendants’ Objection to Plaintiff’s Motion to Compel (ECF No. 67).

WHEREFORE, Plaintiff respectfully prays that this Court deny Defendants’ Motion for Protective Order in its entirety.

Plaintiff,
By his attorney,

Dated: June 8, 2020

/s/ **Chloe A. Davis**
Chloe A. Davis, Esq. Bar No. 9334
Sinapi Law Associates, Ltd.
2374 Post Road, Suite 201
Warwick, RI 02886
Phone: (401) 739-9690
Email cad@sinapilaw.com

CERTIFICATION

Jeffrey G. Latham, Esquire
Christine A. Stowell, Esquire
Tate & Latham
40 Westminister Street, Suite 350
Providence, RI 02903
(401) 421-7400
jlatham@tatelawri.com
cstowell@tatelawri.com

Justin J. Sullivan, Esquire
Lauren E. Hill, Esquire
Department of the Attorney General
State of Rhode Island
150 South Main Street
Providence, RI 02903
401-274-4400
jsullivan@riag.ri.gov
lhill@riag.gov

I hereby certify that on **June 8, 2020**, a true copy of the within was filed electronically via the Court's CM/ECF System. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and the filing is available for viewing and downloading from the Court's CM/ECF System. Service on the counsel of record listed above has been effectuated by electronic means.

/s/ Chloe A. Davis